

FENNEMORE CRAIG, P.C.
Shannon S. Pierce, NV Bar No. 12471
Wade Beavers, NV Bar No. 13451
7800 Rancharrah Parkway
Reno, Nevada 89511
Telephone: (775) 788-2200
Facsimile: (775) 786-5000
Email: spierce@fennemorelaw.com;
wbeavers@fennemorelaw.com
Attorneys for Valley Electric Association, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ANGELA EVANS. an individual,
Plaintiff,

vs.

VALLEY ELECTRIC ASSOCIATION, INC.;
DOES I through X; and ROE Corporations XI
through XX, inclusive,
Defendants.

Case No. 2:20-cv-00986-RFB-VCF

ANGELA EVANS,
Plaintiff,

vs.

NYE COUNTY SHERIFF'S OFFICE, a political
subdivision of the State of Nevada; DAVID
BORUCHOWITZ, individually,
Defendants.

Case No. 2:20-cv-01919-RFB-VCF

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE
REBUTTAL EXPERT DEADLINE
(First Request)**

ANGELA EVANS ("Evans"), VALLEY ELECTRIC ASSOCIATION, INC. ("Valley Electric"); NYE COUNTY SHERIFF'S OFFICE ("NCSO"), and DAVID BORUCHOWITZ (collectively, the "Parties," and each a "Party"), by and through their respective counsel, stipulate as follows:

WHEREAS, the deadline to disclose rebuttal experts is currently set for June 11, 2021 [ECF No. 49];

1 WHEREAS, Plaintiff has represented that her damages expert is not available for
2 deposition until after the rebuttal expert deadline has passed, which impacts Defendants' ability to
3 timely complete their rebuttal expert report;

4 WHEREAS, Defendant Valley Electric Association, Inc. issued a subpoena and deposition
5 notice scheduling the deposition of Plaintiff's Human Resources expert, Ms. Coneisha Sherrod, for
6 June 8, 2021;

7 WHEREAS, the Sherrod deposition did not go forward as previously scheduled, which
8 impacts Valley Electric Association, Inc.'s ability to timely complete its rebuttal expert report;

9 NOW THEREFORE, in light of the foregoing, all parties stipulate and agree that the
10 deadline for disclosing rebuttal experts, currently set for June 11, 2021, is continued by thirty-one
11 (31) days to **July 12, 2021** (the thirtieth day, July 11, 2021, being a Sunday). Any depositions of
12 rebuttal experts (or other witnesses that a party intends to offer to rebut the rebuttal expert) may
13 occur within thirty (30) days after July 12, 2021.

14 Pursuant to LR IA 6-1, the parties state that while the rebuttal deadline has necessarily been
15 extended as a result of two (2) prior requests to extend the discovery cut-off, this is the first request
16 directed at continuing only the rebuttal expert disclosure. Good cause exists for this extension, as
17 one of Plaintiff's experts has been unavailable for deposition, and the other did not appear for her
18 deposition as noticed. Pursuant to LR 26-3, the parties note that at least five (5) additional
19 depositions are already noticed and/or will otherwise move forward in this matter. The parties
20 submit this stipulation not for purposes of delay, but because Defendants have not yet been able to
21 depose individuals that Plaintiff has identified as experts.

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The parties seek only to continue the rebuttal expert deadline. No other deadlines are affected, and no trial date has been set.

IT IS SO STIPULATED.

Dated this 8th day of June, 2021.

MARQUIS AURBACH COFFING

By: /s/ James A. Beckstrom
Craig R. Anderson, Esq.
Nevada Bar No. 6882
James A. Beckstrom, Esq.
Nevada Bar No. 14032
10001 Park Run Drive
Las Vegas, Nevada 89145
*Attorneys for Defendants Nye County
Sheriff's Office & David Boruchowitz*

Dated this 8th day of June, 2021.

LAGOMARSINO LAW

By: /s/ Andre M. Lagomarsino
Andre M. Lagomarsino, Esq.
Nevada Bar No. 6711
Cory M. Ford, Esq.
Nevada Bar No. 15042
3005 W. Horizon Ridge Pkwy., #241
Henderson, NV 89052
Attorneys for Plaintiff

Dated this 8th day of June, 2021.

GABROY LAW OFFICES

By: /s/ Christian Gabroy
Christian Gabroy, Esq.
Nevada Bar No. 8805
Kaine Messer, Esq.
Nevada Bar No. 14240
The District at Green Valley Ranch
170 South Green Valley Pkwy., Ste 280
Henderson, NV 89012
Attorneys for Plaintiff

Dated this 8th day of June, 2021.


FENNEMORE CRAIG, P.C.

By: /s/ Shannon S. Pierce
Shannon S. Pierce, Esq.
Nevada Bar No. 12471
Wade Beavers, Esq.
Nevada Bar No. 13451
7800 Rancharra Pkwy.
Reno, NV 89511
*Attorneys for Valley Electric
Association, Inc.*

THE SANFORD FIRM

By: /s/ Brian P. Sanford
Brian J. Sanford, Esq.
(*Pro Hac Vice*)
Elizabeth J. Sanford, Esq.
(*Pro Hac Vice*)
1910 Pacific Ave., Suite 15400
Dallas, TX 75201
Attorneys for Plaintiff

IT IS SO ORDERED.



Cam Ferenbach
United States Magistrate Judge

6-9-2021

Dated: _____